

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

CHARLES J. WALLACE,

Defendant.

CRIMINAL NO.05-cr-10020 RCL

JOINT MOTION TO ENLARGE TIME FOR DISPOSITION

The United States and Defendant J. Charles Wallace, by their respective undersigned counsel, jointly move this Court to continue the sentencing hearing in this case until after January 1, 2006. Sentencing is currently scheduled for August 23, 2005, at 2:30 p.m.

As grounds for this motion, the parties represent that the additional time is requested in order to allow the defendant an opportunity to provide “substantial assistance” in the prosecution of other individuals, as called for in the parties’ plea agreement.

Specifically, the parties anticipate that Defendant Charles J. Wallace will be a witness in the currently pending case United States v. Daniel McElroy, Aimee King McElroy and Xieu Van Son, No. 05-10019-RGS. At present, the defendants' dispositive motions are pending in that case. It is anticipated that, once those motions have been decided, the case may be set for trial.

Under present circumstances, postponing sentencing is in the interest of both parties and serves the public interest as well.

Respectfully submitted,

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/s/ Gregory G. Nazarian by PGL

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August 1, 2005

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